



Mohawk Medical

BIOLOGICALS • DIAGNOSTICS • INJECTABLES • MEDICAL SUPPLIES • PHARMACEUTICALS • SURGICAL SUPPLIES • VACCINES

Tuesday, May 9, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20857

Re: Docket Nos. 92N-0297 and 88N-0258

Dear Ladies and Gentlemen:

- We are a licensed prescription drug wholesaler doing business in Kentucky, Indiana, and Illinois. We sell to:
 - Individual family physician practices and clinics (208)
 - County and state health departments (21)
 - Federal agencies such as the Corps of Engineers, U. S. Army base hospitals, and VA hospitals (27)
 - Emergency medical services (20)
 - Immediate care centers (10)
 - Other wholesale distributors (6)
 - Veterinary clinics (3)
 - Industrial health services (36)
 - Independent pharmacies (7)
- Most of our customers do not buy from full-line wholesalers because:
 - They do not meet minimum volume requirements
 - Some prescription products are not available from full-line wholesalers
 - Some prescription products are too expensive when purchased from full-line wholesalers
 - Some prescription products are in inconvenient package sizes when purchased from full-line wholesalers
- Our purchases are from:
 - Major full line wholesalers (3) – 83%
 - Other Distributors (8) – 8%
 - Manufacturers (11) – 9%
- We do not receive prescription drug pedigrees from full-line wholesalers or from manufacturers. We receive pedigrees from only 3 of 8 distributors.

88N-0258



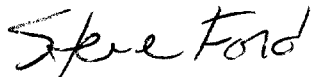
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Tuesday, May 9, 2000
2 of 2

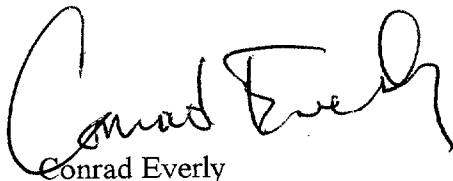
- If we are required to provide prescription drug pedigrees that go back to the manufacturer to our customers, we could do so only in those instances where we have purchased directly from the manufacturer or purchased from an "unauthorized distributor" who is able to provide that complete information to us. Since we do most of our business with major full-line wholesalers who do not provide any pedigrees, we will not be able lawfully to engage in 90% of the transactions we now engage in.

We support a return to the guidance issued by FDA in August 1988 with respect to prescription drug pedigrees and authorized distributors.

Sincerely yours,



Steve Ford
Secretary/Treasurer



Conrad Everly
President